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16 *Counsel for Defendant Meta Platforms, Inc.*

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 RICHARD KADREY, *et al.*,  
21 Individual and Representative Plaintiffs,  
22 v.  
23 META PLATFORMS, INC., a Delaware  
corporation;  
24 Defendant.  
25

Case No. 3:23-cv-03417-VC

**STIPULATION AND ~~PROPOSED~~ ORDER RE  
SCHEDULING OF DEPOSITION OF STEPHEN  
ROLLER**

1 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher  
2 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,  
3 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher  
4 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Defendant”) (collectively, the  
5 “Parties”) by and through their respective counsel stipulate to the following:

6 WHEREAS, the Court entered an Order extending the discovery deadline until December  
7 13, 2024, ECF No. 211;

8 WHEREAS, the parties originally agreed to schedule the deposition of third-party Stephen  
9 Roller for December 11, 2024, before the December 13, 2024 fact discovery deadline;

10 WHEREAS, Mr. Roller has come down with an illness that has required his deposition to  
11 be rescheduled, which the parties have agreed will take place on December 18, 2024, subject to the  
12 Court’s permission.

13 WHEREAS, there has only been one extension of the fact discovery deadline requested and  
14 entered in this case, which was the Court’s Order setting the December 13, 2024 fact discovery  
15 deadline, ECF No. 211; and only one other deposition has been scheduled to be taken after the fact  
16 discovery close, ECF No. 277;

17 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through  
18 Plaintiffs and Defendant, as represented by their undersigned counsel and subject to the approval  
19 of the Court, that the deposition of Mr. Roller may occur on Wednesday, December 18, 2024, after  
20 the close of fact discovery. No other deadlines are modified by this stipulation.

Dated: December 11, 2024

Respectfully Submitted,

By: /s/ Teresa H. Michaud

By: /s/ Rachel Geman

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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

**ECF ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concurs in the filing of this document.

By: /s/ Teresa H. Michaud  
Teresa H. Michaud

**PROPOSED ORDER**

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.**

DATED: December 12, 2024

  
\_\_\_\_\_  
HON. VINCE CHHABRIA  
United States District Judge